

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

<p>Rinne Corp,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p style="text-align: center;">The Partnerships, and Unincorporated Associations Identified in Schedule A,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 1:23-cv-16232</p> <p>Honorable Judge Jeffrey I. Cummings</p>
--	--

DECLARATION OF SIWEI HUANG

I, Siwei Huang, declare as follows:

1. I am an employee of Suzhou Chenghe Network Technology Co., Ltd. (**Chenghe**), which operates the internet store, goblinpocket.com (the **Store**), identified in this lawsuit. In this capacity, I have personal knowledge of the Store's operation and sales and have access to Chenghe's business records.
2. I make this declaration based on my personal knowledge and after reviewing Chenghe's business records. If called as a witness, I can competently testify to the matters stated herein.
3. Chenghe is incorporated and has its principal place of business in China. Chenghe operates the Store exclusively in China. Chenghe has never owned or utilized an office, hired employees, agents, or representatives, maintained bank accounts, owned assets or properties, or qualified to do business in Illinois or any other part of the United States.
4. Neither the Store nor Chenghe has targeted Illinois residents with their advertisements, nor directed any marketing efforts or materials at Illinois.

5. Rinne Corp (the **Plaintiff**) alleges the Store has infringed on its copyrights and trademarks. Specifically, Plaintiff's counsel has provided the attached **Exhibit A**, which shows the allegedly infringing products (collectively, **Alleged Products**).

6. After reviewing the complaint and Exhibit A provided by counsel, I conducted a diligent search of the Store's sales records for the Alleged Products. **Exhibit B** contains complete and accurate sales records, maintained in the ordinary course of Chenghe's business.

7. Exhibit B shows that the Store has made no sale of the Alleged Products in the U.S.

8. There are many similar mousetrap products for sale online. A brief search reveals numerous similar pictures and sales links for such products. Many listings use product descriptions of "flip and slide." *See* Exhibit C.

9. Before this litigation, the Store was not aware, nor had any reason to be aware, that it could be infringing any copyrights or trademarks. The Store has not attempted to market or pass off its products as those of the Plaintiff or any other party.

10. The Store has not received summons of this lawsuit at its email address.

11. The Store has three Paypal accounts for the Alleged Products, chenghesheep@outlook.com, chenghesite@126.com, and chenghe8827@126.com, with a total frozen amount of \$1,981,660 due to the asset restraints imposed by this litigation.

12. The Store still plans to continue business operations. However, the existing restraints significantly hinder the Store's liquidity and ability to maintain normal operations.

13. Upon notice of the current litigation (not through service of summons), Chenghe has permanently removed the listings of the Alleged Products. While Chenghe is moving to challenge the Preliminary Injunction Order (Dkt. 41), Chenghe assures the court it will not relist the Alleged Products for sale until further ordered by the court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and accurate.

[The remainder of this page is intentionally left blank.]

Executed on this 27th day of May, 2024, in Suzhou, Jiangsu, China.

Dated: May 27, 2024

By: Siwei Huang
Siwei Huang

EXHIBIT A

🇺🇸 USD 🌐 English

[Home](#) [Search](#) [Contact us](#) [All Collections](#)

Slide Bucket lid Mouse Rat Trap



Smart Flip N Slide Bucket Lid Mouse Trap

\$29.99 ~~\$59.98~~ **Save 50%**

📦 5.7K Month Sold

👍 It's been recommended by 176 people on Facebook, Twitter and Instagram

👁️ 865 people are viewing this right now

Klarna.4 interest-free payments. Available for orders above \$35. [Learn More](#)

Quantity

BUY 1

🔥 (\$20 OFF) 2 PIECES

🔥

(BUY 2 GET 1 FREE) 3 PIECES

Quantity

- 1 +

👁️ 67 visitors currently looking at this product

🛒 ADD TO CART



RECENTLY VIEWED ^

🔥 BIG SALE 🔥 VITA...

M***k

Recently purchased

 USD  English[Home](#) [Search](#) [Contact us](#) [All Collections](#)


What's Included



Smart Flip N Slide Bucket Lid Mouse Trap

\$29.99 ~~\$59.98~~ **Save 50%**

 5.7K Month Sold

 It's been recommended by 176 people on Facebook, Twitter and Instagram


 865 people are viewing this right now

Klarna.

4 interest-free payments. Available for orders above \$35. [Learn More](#)

Quantity

BUY 1


 (\$20 OFF) 2 PIECES



(BUY 2 GET 1 FREE) 3 PIECES

Quantity

— 1 +

 67 visitors currently looking at this product

 **ADD TO CART**



RECENTLY VIEWED ^



 **BIG SALE**  **VITA...**

M***k

Recently purchased

What's Included



WHY OUR MOUSE TRAP BUCKET LID OVER CONVENTIONAL TRAPS?

- 🐭🐭 Automatically Resets and holds upwards of 30 mice and 10+ medium-sized Rats; unlike conventional traps which only catch 1 or 2
- 🧼🍌 Sanitary And No Mess - No more having to dispose of dirty corpses from a glue or snap trap, which can potentially infect you with a deadly disease. Now simply release/dispose of the mice/rats without getting close to the mess.
- 🔧🌟 Reusable - The Smart Flip n Slide Bucket Lid Mouse Trap is not a one-and-done throwaway product. You can use our trap repeatedly without having to toss it out.
- 🐶👶 Pet/ Children Friendly - Stop purchasing traditional Mouse/Rat traps which can harm your family pet or even worse... your children. Our Mouse/Rat trap is 100% safe and nontoxic.

HOW DOES IT WORK?

Turn an ordinary 5-gallon bucket into the best trap on the market. No more dealing with 1-time use traps that are often ineffective and unsanitary. With our new Smart Flip n Slide Bucket Lid Mouse Trap, all you have to do is snap it onto a standard-sized 5-gallon bucket and boom you're catching mice and rats.



Reusable Smart Mouse Trap For Mice Flip Slide Bucket Lid

Humane Lethal Traps Auto Reset Rat Door Style Catcher

goblinpocket

Cart

Information

Shipping

Payment

Contact

johndoe789@gmail.com

Change

Ship to

73 E Lake St. Chicago, 60601 Illinois United States (US)

Change

Shipping method

Standard Shipping

\$ 5.99

Expited Shipping

\$ 8.99

Add Shipping Insurance to your order \$ 0.90

< Return to information

Continue to payment

All rights reserved goblinpocket

goblinpocket*UK

1

Smart Flip N Slide Bucket Lid Mouse Trap

BUY 1

\$ 29.99

Coupon code

Apply

Subtotal

\$ 29.99

Shipping Insurance

\$ 0.90

Shipping

\$ 5.99

Total

USD \$ 36.88

WHY CHOOSE US?

30-day Satisfaction guarantee with Money Back

If you're not satisfied with your products we will issue a full refund, no questions asked.

Over 34.245 successfully shipped orders

We made as much happy customers as many orders we shipped. You simply have to join our big family.

EXHIBIT B

- Order
- All Orders
- Abandoned Order
- Product manage...

All Orders

Export Import

All Unfulfilled

All order status All delivery... Start date ~ End date All paymen... All payment c... Country/ R... Payment Status smart-flip-n-slide-bucket-lid-mouse-trap Search

Order number Payment time Payment Status Payment method Payment channel Logistics status Total Amount Product Country/ Region Operation



0 total

< 0 > 50 / page

EXHIBIT C

A product image showing two red bucket lid mouse traps. One trap is shown from a top-down perspective, and the other is shown from a side perspective, revealing its internal mechanism. A black measuring tape is placed next to the traps for scale. A small white container with a red cap is also visible.

Arber Traps Bucket Lid Mouse Trap, Fits on 5 Gallon + 12 Pcs Sticky Mouse Traps Glue + 6 Pcs Spring Snap Traps for Mice - Multi Catch Human...

★★★★☆ 38

\$29⁹⁷



Brand: KIWSEIY
3.1 ★★★★★ 24 ratings
100+ bought in past month

Get Fast, Free Shipping with Amazon Prime
FREE Returns ▾

Brand	KUWSEIY
Color	2 Pack
Style	Modern
Material	Plastic
Product Dimensions	12.17"L x 12.17"W x 2.99"H
Number of Pieces	1

- **【Bucket Mouse Trap】** Automatically resets and holds upwards of 10 mice and 5+ medium-sized Rats. Unlike conventional mouse trap bucket lid which only catches 1 or 2. The test concluded that the multi-catch traps by almost 4x. [5 Gallon Bucket is NOT included]
- **【Pet/Children Friendly】** Stop purchasing traditional mouse trap which can harm your family pet or even worse harm your children. Our humane mouse trap is 100% safe, please feel free to use it.
- **【Easy To Use】** Only snap it onto a standard-sized 5 gallon bucket mouse trap and boom your catching mice and rats. Now simple release of the mice far away from your house.

Enjoy fast, free delivery,
exclusive deals, and award-
winning movies & TV shows
with Prime
Try Prime and start saving today
with fast, free delivery

Pickup

Ships from	Amazon
Sold by	KUWSEIY
Returns	Eligible for Return, Refund or Replacement within 30 days of receipt
Payment	Secure transaction

https://www.amazon.com/ref=pay_logo

Patio, Lawn & Garden › Pest Control › Traps



Mouse Trap, Flip and Slide Bucket Lid Mice Rat Trap, for Indoor Outdoor Multi Catch Auto Reset (Size : Black)

Brand: SnOwky

\$36⁸⁹

Get \$10 off instantly: Pay \$26.89 \$36.89 upon approval for the Amazon Store Card. No annual fee.

Size: **Black**

- Yellow
\$36.89
- Red
\$36.89
- White
\$36.89
- Black**
\$36.89

Brand SnOwky
Color One Color
Item Weight 516 Grams
Number of Pieces 1

About this item

- 【Special Designed】This trap was designed with the intent to be used in a catch and release style, but it is optionable to fill the bucket up with water to make the trap lethal.
- 【Cleaner than ever】No more need to discard dirty mice with glue or traps, which can infect them with a deadly disease.Now, just release/dispose of the mouse without having to go anywhere near the mess.
- 【Easy to use】All you have to do is clip it into a standard size 5-gallon bucket and use it to catch rats and mice.No longer handle single-use traps, which are often ineffective and unhygienic.
- 【Family Friendly】Stop purchasing traditional mouse traps which can harm your family pet or even worse... your children. Our mouse trap is 100% safe .
- 【Reasonable use】We can spread peanut butter in the tunnel of the mousetrap, and the mouse will follow the smell into the tunnel, and fall back into the bucket without getting the peanut butter.

Report an issue with this product or seller



Kat Sense: Your Department of Defense
Kat Sense Covered Rat &...
\$17⁹⁶ \$19.96 ✓prime
Save 10% more with Subscribe & Save

\$36⁸⁹

\$3.99 delivery **June 6 - 17.**

[Details](#)

Delivering to Los Angeles 90020 - [Update location](#)

In stock

Usually ships within 4 to 5 days.

Quantity: 1 ▾

Add to Cart

Buy Now

Ships from 新绛县盛田百货店
Sold by 新绛县盛田百货店
Returns 30-day refund/replacement
Payment [Secure transaction](#)

Add to List



HECO ARMOR
Outdoor Hanging Wasps Traps

HECO ARMOR Wasp Traps, Outdoo...
★★★★☆ 69
20% off Limited time deal
\$23⁹⁹ \$29.99 ✓prime

Sponsored ⓘ

Got ants? Defend your home with Combat.

Sponsored



Package does NOT include Bucket
(Trap Lid fits 5 Gallon Bucket)



MG

Mouse Rat Trap Flip & Slide Mouse Trap Bucket Catcher Mousetrap Slide Bucket Lid

★★★★☆ (3.2) 29 reviews

Free shipping

Free 30-day returns

\$9.95 Price when purchased online

Add to cart

How do you want your item?



Shipping
Arrives May 31
Free



Pickup
Not available



Delivery
Not available

Delivery to Los Angeles, 90020



Sold and shipped by Alltech Devices, LLC | Pro Seller

★★★★☆ 103 seller reviews

View seller information



Free 30-day returns Details



Add to list



Add to registry

Continue your search on Walmart

bucket mouse trap

onebit rat bar poison

rinnetraps - flip n slide bucket lid mouse trap

mouse tramp

rat trap bucket

flip and slide mouse trap

mouse trap flip bucket top

bucket mouse trap 5 gallon

Similar items you might like

Based on what customers bought



Reduced price

12PCS



Sponsored

\$37.71

Oxgord Live Animal Trap Humane Catch & Release Cage Cat Rabbit Rodents 2-Door Foldable Heavy Duty Trapping Kit (Large)...

★★★★☆ 134

2-day shipping

+ Add

 Flying insect light trap Free of chemical insecticides.

Sponsored



How This Trap Works

1.



Mice climb the provided ramp toward the bait located inside of the tunnel

2.



Mice will inch out onto the counter weighted platform to eat the bait

3.





The mouse's weight will trigger the platform to fall forward

4.



The platform will then automatically reset for the next mouse

NOTE: BUCKET NOT INCLUDED



Estrela


Flip N Slide Bucket Lid Mouse Trap,Slide N Bucket Lid Mouse Rat Trap,Auto Reset Mouse Trap for Indoor and Outdoor (Yellow)


Free 30-day returns


\$9.99 Price when purchased online

Add to cart

How do you want your item?

- 

Shipping
Arrives Jun 7
\$7.00
- 

Pickup
Not available
- 

Delivery
Not available

Delivery to **Los Angeles, 90020**


Sold and shipped by **Estrela**
[View seller information](#)
Free 30-day returns [Details](#)


 [Add to list](#)

 [Add to registry](#)


Popular items in this category


Best selling items that customers love





Options





+ Add






Options





+ Add




Sponsored

\$21.99

2 Pack Mouse Catchers Bucket Lid with Upgraded Clear Box, 2 Entrances & Auto Reset, Reusable Humane Rat Catcher for...

2-day shipping


+ Add





Flying insect light trap

Free of chemical insecticides.

Sponsored ⓘ



2Pack



Aegis

2x Mice Trap Reusable Smart Flip and Slide Bucket Lid Mouse Rat trap Auto Reset

★★★★☆ (2.9) [7 reviews](#)


Free shipping

Free 30-day returns

\$19.99 Price when purchased online ⓘ

Add to cart


How do you want your item?



Shipping


Arrives May 31

Free



Pickup


Not available



Delivery

Not available

Delivery to Los Angeles, 90020


 Sold and shipped by **Aegis Inc**


★★★★☆ 84 seller reviews


[View seller information](#)

Free 30-day returns

[Details](#)

 [Add to list](#)

 [Add to registry](#)



Sponsored


\$11.99


HYEASTR Mouse Trap Bucket Flip Lid Mouse Rat Trap Bucket Lid Auto Reset Multi Catch Humane Rat Trap for Indoor...


3+ day shipping


+ Add


Continue your search on Walmart


 rinnetraps - flip n slide bucket lid mouse trap


 mouse trap that goes on a bucket

 rat traps

 rat trap bucket

 auto reset barrow mouse and rat





 rat trap bucket lids

 rodent traps

Similar items you might like

Based on what customers bought

100+ bought since yesterday



OFF!

Prevent bug bites

Protection for every day.

Sponsored



Wide Range of Use

VERY EFFICIENT & HUMANE

Efficient Humane Mouse Trap

Human, Pet & Eco Friendly

Your Kitchen Good Helper







HYEASTR
HYEASTR Mouse Trap Bucket Lid (2 Pack) - Humane Flip and Slide Bucket Lid Mouse/Mice/Rat Trap, Auto Reset, Multi Catch Mice Trap Compatible with 5 Gallon Bucket for Indoor/Outdoor/Chicken Coop
★☆☆☆ (1.0) [1 review](#)

 Free shipping  Free 30-day returns

\$1679 Price when purchased online

Add to cart

How you'll get this item:



Shipping
Arrives May 30
Free



Pickup
Not available



Delivery
Not available

Los Angeles, 90020 [Change](#)

Arrives by **Thu, May 30** | [More options](#)

 Sold and shipped by **HYEASTR STORE**
★★★★☆ 3 seller reviews
[View seller information](#)
 Free 30-day returns [Details](#)

 [Add to list](#)  [Add to registry](#)

Similar items you might like

Based on what customers bought





+ Add





+ Add





+ Add





Options



Sponsored

\$37.71

Oxgord Live Animal Trap Humane Catch & Release Cage Cat Rabbit Rodents 2-Door Foldable Heavy Duty Trapping Kit (Large)...

★★★★☆ 134

2-day shipping

+ Add

 [Report an issue with this product or seller](#)Sponsored 

Page 1 of 2

Add to List



Raid Essentials Flying Insect Light Trap Starter Kit, 1 Plug-In Device + 1...
★★★★☆ 2,938

Save 5% more with Subscribe & Save

Shop now

◀ Back to results



Roll over image to zoom in



VIDEO



Walk The Plank Bucket Mouse Trap | Flip and Slide | Water-Proof | Durable | Auto-Reset - Live or Kill

Brand: PLANKYPRO
3.9 ★★★★★ ▾ 775 ratings
50+ bought in past month

-10% \$17⁹⁹

List Price: \$19.99 ⓘ

Get Fast, Free Shipping with Amazon Prime
FREE Returns ▾

Get \$10 off instantly: Pay \$7.99 \$17.99 upon approval for the Amazon Store Card.
No annual fee.

Item Package Quantity: 1

Color: Black

Brand	PLANKYPRO
Color	Black
Style	Plank
Material	Plastic
Number of Pieces	1
Is Electric	No
Target Species	Mouse, Rat

About this item

- AUTO RESET: The trap resets automatically. You can catch multiple mice at once.
- WATERPROOF: Unlike other traps in the market, our trap is made from durable waterproof plastic.
- POISON FREE: Simply use peanut butter or any other bait that can be stuck to the trap. Keeps your pets safe and out of danger.
- LIVE OR KILL: You have option of using the device as a live catch or to kill the mice. Use water in the bucket if you intend on not releasing the mice. Using fine sand or saw dust at the bottom prevents the mice from jumping out. Using taller bucket is help with the live catch.
- IMPORTANT (UNIVERSAL BODY) : This plank included in this trap set is specifically calibrated for smaller mice. However a set including bigger plank is available for purchase. Additionally you can also just buy the bigger plank only if you already purchased the smaller trap set. The same UNIVERSAL BODY works with both plank.

Additional Details

Small Business



Enjoy fast, free delivery, exclusive deals, and award-winning movies & TV shows with Prime
Try Prime and start saving today with fast, free delivery

Delivery Pickup

One-time purchase: ☒
\$17⁹⁹

Get Fast, Free Shipping with Amazon Prime
FREE Returns ▾

FREE delivery Tuesday, May 28
on orders shipped by Amazon over \$35

Or fastest delivery Tomorrow, May 23. Order within 7 hrs 6 mins

📍 Delivering to Los Angeles 90020 - Update location

In Stock

Quantity: 1 ▾

Add to Cart

Buy Now

Ships from Amazon
Sold by Polyproducts44_USA
Returns Eligible for Return, Refund or Replacement within 30 days of receipt
Payment Secure transaction

☐ Add a gift receipt for easy returns

Subscribe & Save: ☐
\$17⁹⁹ (\$17.99 / Count)
FREE delivery Tuesday, May 28
on orders shipped by Amazon over \$35